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Via ECF

November 21, 2024

Hon. James M. Wicks, U.S.M.J.
United States District Court
Eastern District of New York
100 Federal Plaza, Courtroom 1020
Central Islip, NY 11722-4438

Re: Deo, et. al. v. Baron, et. al., Case No. 2:24-cv-6903 (JMW)

Dear Magistrate Judge Wicks:

This firm represents defendants Ronald Baron, Joshua Aaronson, Jory Baron, Marcello Sciarrino, Daniel O'Sullivan, Brian Chabrier, Wendy Kwun, Iris Baron, Raymond Phelan, Asad Khan, Estate Of David Baron, Baron Nissan Inc. d/b/a Baron Nissan and Island Auto Group of New York LLC a/k/a Island Auto Group of NY LLC a/k/a Island Auto Group (the "Island Auto Defendants").

On November 19, 2024 a conference in this matter was held before Hon. Nusrat J. Choudhury, U.S.D.J. concerning certain outstanding issues, including requests for a pre-motion conference by certain defendants seeking to file a motion to dismiss the complaint. At the conference Judge Choudhury issued a Scheduling Order, entered as a Text Order on November 20, 2024, directing, *inter alia*, that Plaintiffs must amend their complaint or notify the Court of their intent not to amend by January 31, 2025 and that Defendants shall serve any motion to dismiss by April 1, 2025.

It is unknown at this time whether the complaint will be amended. However, amended or not, defendants are to serve any motion to dismiss by April 1, 2025. Being that we do not currently know what the ultimate complaint will allege, and we further do not know at this time if the Island Auto Defendants will move to dismiss the complaint, we respectfully request that the Island Auto Defendants be granted until April 1, 2025 to respond to the Complaint or any Amended Complaint.

We thank the Court for its consideration in this regard.

Respectfully yours,

/s/ Jeffrey C. Ruderman
Jeffrey C. Ruderman

cc: all counsel via ECF

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